



Iowa Department of Human Services

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INFORMATIONAL LETTER NO.1478

DATE: February 16, 2015

TO: Iowa Medicaid Nursing Facilities

ISSUED BY: Iowa Department of Human Services, Iowa Medicaid Enterprise (IME)

RE: Other Provider Preventable Conditions (OPPC) - Nursing Facilities (NF)

EFFECTIVE: March 1, 2015

Section 2702 of the Patient Protection and Affordable Care Act of 2010 (ACA) prohibits federal payments for any amount expended for health care-acquired conditions. The federal regulations at 42 CFR 447.26 to implement the requirement specify that payment cannot be made for other provider-preventable conditions (OPPC) for any health care setting.

Under this regulation, states are required to identify the following conditions for non-payment:

- Wrong surgical or other invasive procedure performed on a patient
- Surgical or other invasive procedure performed on the wrong body part
- Surgical or other invasive procedure performed on the wrong patient

In the NF setting, the IME expects a fairly limited subset of such “invasive” procedures. However, NF providers should review the [definition of “surgical or other invasive procedure” that has been adopted in the department’s rules](#)¹, which will be effective March 1, 2015.

When a NF provider encounters an OPPC, **any days that are attributable to the OPPC must be reported as non-covered days** on the electronic institutional claim form. If there are other types of non-covered days on the claim, these should simply be added to the total. **In addition, at least one diagnosis code from the list below should be on the claim:**

- E876.5-Performance of wrong operation (procedure) on correct patient
- E876.6-Performance of operation (procedure) on patient not scheduled for surgery
- E876.7-Performance of correct operation (procedure) on wrong side/body part

It is the responsibility of the provider to identify and report any OPPC and not seek payment from Medicaid for any additional expenses incurred as a result of the OPPC.

The IME appreciates your continued partnership. If you have any questions, please contact the IME Provider Services Unit at 1-800-338-7909, locally in Des Moines at 515-256-4609 or via email at imeproviderservices@dhs.state.ia.us.

¹ <https://www.legis.iowa.gov/docs/ACO/IAC/LINC/01-07-2015.Rule.441.81.1.pdf>